Federal Defenders OF NEW YORK, INC.

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Leonard F. Joy Executive Director and Attorney-in-Chief

By hand

Honorable Deborah A. Batts United States District Judge Southern District of New York 500 Pearl Street New York NY 10007

Re: <u>United States v. Angel Rodriguez</u> 10 Cr. 1107 (DAB)

Your Honor:

NOV 19 2010

CHAMBERS OF DEBORAH A. BATTS
U.S.D.J

On the government's consent (by Sarah Paul, Esq., AUSA, Tel.: 212 637-2326) and still awaiting the response to my voice mail message to Pretrial Service Officer Mildred Santana (Tel.: 212 805-4116) we respectfully request that Mr. Rodriguez be authorized to travel to his mother, Sondra Fontanez, his son, Angel Junior and the boy's mother, Priscilla Florez, for Thanksgiving at 713 N. James St., Hazelton, PA, 18201, telephone 570 497-7182, leaving New York November 24, and returning November 27, 2010.

Mr. Rodriguez' is at liberty on a \$50,000 personal recognizance bond cosigned by his sister Karen Rodriguez with whom he lives in Queens New York (and who would be traveling with him to be with their mother) and her fiancé Miguel Ortiz. His bail conditions limit him to the Southern and Eastern districts of New York. He has been faithfully reporting to Pretrial Services, appeared on time for his arraignment before United States magistrate judge Frank Maas on November 15 to be arraigned and is due to appear before Your Honor for the first pretrial conference November 22<sup>nd</sup>.

We make this application now rather than on the 22nd, at our a conference, in order for Mr. Rodriguez to make travel arrangements as early as possible if Your Honor were to grant this application.

Roland Thau Staff Attorney

Respectfully

Tel.: (212) 417-8733

cc: sarah.paul2@usdoj.gov

Ms. Mildred Santana, Pretrial Services

Deborah a. Batu

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

MEMO ENDORSED